

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT CHATTANOOGA

JONATHAN MANLOVE, )  
Individually, and on behalf of others )  
similarly situated, )  
Plaintiff, )  
v. )  
No. 1:18-cv-145  
VOLKSWAGEN AKTIENGESELLSCHAFT, )  
VOLKSWAGEN GROUP OF AMERICA, )  
INC., and VOLKSWAGEN GROUP OF )  
AMERICA CHATTANOOGA )  
OPERATIONS, LLC, )  
Defendants. )

**JOINT MOTION FOR STIPULATED ORDER RESETTING HEARING DATE AND  
MODIFYING BRIEFING SCHEDULE**

The parties, by and through counsel, pursuant to Local Rule 7.1(a), jointly request and stipulate that the Court reset the hearing on Plaintiff's Motion for Preliminary Injunction to January 10, 2019, and modify the briefing schedule so that Defendants' response to Plaintiff's motion is due on or before January 3, 2019.

Plaintiff filed his Motion for Preliminary Injunction on Thursday, December 6, 2018. On Monday, December 10, 2018, the Court issued its Order setting a briefing schedule on the Motion and setting a hearing date of January 3, 2019 at 10:00 a.m. One of the primarily responsible attorneys for Defendants, Charles B. Lee, is scheduled to be out of state on vacation during the time of the hearing as it is currently set. The parties have agreed to move the hearing to January 10, 2019, assuming that date remains available. The parties have further agreed to extend the deadline for Defendants to respond to the Motion until January 3, 2019, and to extend the deadline for Plaintiff to file a reply, if any, until January 8, 2019.

Notwithstanding this joint motion, Defendants note that they also intend to file a motion to hold Plaintiff's Motion for Preliminary Injunction in abeyance until after the Court rules upon the pending motions to compel arbitration and to dismiss (ECF Nos. 29 and 31). Plaintiff intends to oppose that motion. Defendants have proposed and agreed to this joint motion and stipulated order as an interim measure without prejudice to the Defendants' right to request that the Motion for Preliminary Injunction be held in abeyance.

Accordingly, the parties stipulate and jointly request that the hearing on Plaintiff's Motion for Preliminary Injunction be reset for January 10, 2019, and that the Court's briefing schedule be modified so that Defendants' response to the Motion be due on or before January 3, 2019, and that Plaintiff's reply, if any, be due on or before January 8, 2019.

Respectfully submitted this 11th day of December 2018.

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